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November 29, 2021

**By ECF**

Honorable Gabriel Gorenstein  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,  
No. 20 Civ. 8924 (CM) (GWG)

This filing is related to: *Krystin Hernandez, et al. v. City of New York, et al.*,  
No. 21 Civ. 7406 (CM) (GWG)

*DL*  
*Colleen McMahon*  
12/3/2021

MEMO ENDORSED

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. I write to respectfully request an additional two-week extension for defendant police officers Assistant Chief Kenneth Lehr and Police Officer Harvey Rabel, to answer or otherwise respond to the Complaint. Counsel for plaintiffs does not object.

On November 15, 2021, Hon. Colleen McMahon graciously extended these defendants' time to answer or otherwise respond to the Complaint to December 6, 2021. Officer Rabel is on vacation and unreachable, however, until after December 3, 2021. As it may take some time after his return to contact and speak with him, this office respectfully asks for some additional time to determine representation and draft a response to the complaint on his, and in order to preserve resources and be permitted to draft a single response for both defendants, Chief Lehr's, behalf.

Thank you for your consideration herein.

Respectfully submitted,

*Dara L. Weiss s/*

Dara Weiss  
Senior Counsel  
Special Federal Litigation Division

cc: All *Hernandez* Counsel (By ECF)